

## Western Electricity Coordinating Council – Comment on EIM Second Revised Straw Proposal

- Page 9, item G – Please clarify how the EIM Entity will *Submitting and maintaining their system operating limits (inter-ties and internal constraints) as needed for the market. This includes adjusting/conforming limits as required due to differences between actual flow as measured by actual telemetry or state estimator and the flows calculated by the market model (market flow). Note that small differences in actual and market flows can arise due to differences in the model and actual conditions such as load distribution factors, unscheduled flow, network topology and impedances.*

It seems like this is suggesting the EIM Entity will adjust their limits if the EIM Operator SE solution is not good enough. Is that the intention?

- Page 10, section 3.1.4 – the balanced load, generation, and interchange schedules should be the same schedules submitted to the WECC RC for reliability studies.
- Section 3.1.1 and 3.1.3– Clarify that current functions will be handled by the ISO/EIM Entity only for the respective BAA
- Section 3.1.2 – Says “The MO may or may not commit, start-up or shut down any resource in the EIM Entity BAA...” This is unclear – based on the discussion in Phoenix, it appears this refers to the option of the EIM entity to allow commitment or not in RTUC. Please clarify this in the documentation.
- Page 16 – for “Within OG+60 min” says the EIM action will be to “estimate dynamic schedules may be updated by EIM Entity”. Please clarify whether this is for the EIM dynamic schedules or all dynamic schedules?
- Page 31, paragraph 2 – It seems the measure of sufficiency should be total demand forecast plus export schedules less import schedules to more appropriately reflect the obligations of the EIM Entity.
- Page 31, last paragraph – reference to “NERC and WECC policies” should probably be to “NERC and WECC standards”.
- Page 32, paragraph 3 – Says “In this case, the EIM Entity must include this adjustment in the transmission capacity that it reports to the Market Operator as being available to EIM.” Is this just a matter of defining the appropriate limit, or is it separate reporting for TRM?
- Section 3.6.1 – reference to “resource sharing groups” is supposed to be “reserve sharing groups
- Page 45, paragraph 3 – says “....which may require the EIM Entity to initiate the procedures under WECC regulations.” WECC standards do not *require* that the UFMP be used, it is a tool that is available to transmission operators of qualified paths, not to BAAs, and this should be clarified.
- Page 58, section 3.7.10.1 – reference to implementing EIM for the entire “WECC” should be for the entire “Western Interconnection”.

- Section 3.6.4 *“The EIM will not automatically initiate the UFMP, but will alert EIM Entities to conditions that EIM cannot resolve”* – What does the “alert” look like?
- Page 44, section 3.6.2 – says *“The EIM dispatches and demand forecast deviations will be netted for each EIM Entity BAA to produce a dynamic net interchange schedule for AGC purpose.”* Is it expected that this dynamic net interchange schedule will be provided to the RC on a real-time basis?
- Page 44, section 3.6.3 – says *“The Market Operator will not issue Exceptional Dispatches to EIM Participating Resources. The EIM Entity may do so for EIM Entity BAA purposes.”* Coordination among the Market Operator, the EIM Entity and the RC should be discussed to ensure proper and sufficient communication.
- Page 45 last paragraph – says *“Subject to the EIM Entities’ dynamic transfer policy dynamic transfers to EIM Entities may make resources outside the EIM footprint available to the EIM...”* Is this only for resources that are either dynamically scheduled or pseudo-tied into the EIM Entity? How do you assure that if the same resources has dynamic schedules with more than one EIM Entity that it is not double counted?
- Page 51, first paragraph of 3.7.7.1 – says *“The Market Operator will use the WECC Interchange Tool to receive e-Tag information related to the EIM Entity BAA’s interchange points with other BAA’s that are not ISO.”* – have discussions been held with OATI or WECC on this? WECC holds the contract with OATI for the WIT and coordination will need to include WECC.
- Overall (this may be an offline type question) – What data will be provided to the RC on EIM flows and transactions on a real-time basis? How can we best coordinate between the RC, the ISO and the EIM Entities?

General question – The market solution and dispatch instruction is driven heavily by the state estimator solution, yet settlements are driven by meter data. While this is typical for energy market operations, what is CAISO plan to ensure proper SE solutions prior to market launch? Are there metrics in place to provide confidence that new EIM participants models and the SE solution are accurate?

General question – Are there any efficiencies that can be gained by using the WECC RC WSM instead of duplicating all of the modeling that is currently done by the EIM participant and the WECC RC already?

General question – What safety measures are in place to ensure that the EIM does not result in problematic dispatch that actually drives generation in the wrong direction? WECC RC has seen occasions where system frequency is outside of frequency trigger limits and the RC logged reason is “CAISO market issues”. With more generation under dispatch control by the CAISO, we need to be sure that this issue is properly mitigated.